

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |   |                            |
|---|---|----------------------------|
| JAMES CONTANT, MARTIN-HAN                     | : |                            |
| TRAN, CARLOS GONZALEZ, UGNIUS                 | : |                            |
| MATKUS, JERRY JACOBSON, and                   | : | No. 1:17-cv-03139-LGS      |
| PAUL VERMILLION, on behalf of                 | : |                            |
| themselves and all others similarly situated, | : | <u>RULE 7.1 DISCLOSURE</u> |
|   | : |                            |
| Plaintiffs,                                   | : | ECF Case                   |
|   | : |                            |
| v.  | : |                            |
|   | : |                            |
| BANK OF AMERICA CORPORATION, et               | : |                            |
| al.,  | : |                            |
|   | : |                            |
| Defendants.                                   | : |                            |
|   | : |                            |
|   | : |                            |

**RULE 7.1 DISCLOSURE**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, The Royal Bank of Scotland Group plc and RBS Securities Inc., which have been named as a defendants in the above-captioned matter, make the following disclosures through their undersigned counsel:

Defendant The Royal Bank of Scotland Group plc is a publicly traded company organized under the laws of Scotland. No publicly held corporation owns 10% or more of its stock.

Defendant RBS Securities Inc. is indirectly 100-percent owned by defendant The Royal Bank of Scotland Group plc.

Dated: New York, New York      Respectfully Submitted,  
May 17, 2017

DAVIS POLK & WARDWELL LLP

By: /s/ Joel M. Cohen  
Joel M. Cohen

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and RBS Securities Inc.*